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August 11, 2017

Via ECF

Hon. Madeline Cox Arleo, U.S.D.J.
U.S. District Court
M. L. King, Jr. Federal Building & Courthouse
50 Walnut St., Room 2A
Newark, NJ 07102

**Re: Roofers' Pension Fund v. Papa and Perrigo Company PLC
Civil Action No. 2:16-cv-2805 (MCA)(LDW)**

Dear Judge Arleo:

We represent defendant Perrigo Company plc ("Perrigo") in the above-referenced matter.

Pursuant to the Stipulation and Order Regarding Consolidated Amended Complaint and Responsive Briefing (Dkt. No. 79), and the Stipulation and Order Regarding Service of Process and Response of New Defendants (Dkt. No. 97), the response of Perrigo and ten of the eleven individual defendants to the Amended Complaint is due by August 21, 2017.¹

On August 21, 2017, Perrigo and at least eight of the individual defendants (and possibly one or two more) will submit one motion and one brief in support of their motion to dismiss. We write to seek the Court's approval of an extension of the page limits in connection with that motion to dismiss.

Under Local Civil Rule 7.2(b)-(d), opening briefs written in 12 point proportional font are limited to 30 pages in length. We respectfully request an extension of the page limit for the

¹ A Stipulation and Proposed Order Regarding Service of Process and Response of Defendant Marc Coucke was submitted to the Court on August 10, 2017. In the event that the Court enters that Stipulation as an Order, the response to the Amended Complaint of Mr. Coucke, the other individual defendant, is due by August 25, 2017.

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opening brief from 30 to 60 pages (based upon a submission in 12 point proportional font). We request this extension of the page limit because of the need to address the allegations and claims in the Amended Complaint (for alleged violation of the Federal Securities Laws), which contains 308 paragraphs of allegations spanning 138 pages and names 12 defendants. The brief must also address allegations and claims relevant to each defendant on whose behalf it will be submitted. However, by submitting one brief on behalf of at least nine defendants (and possibly more) we are avoiding the simultaneous submission of many additional briefs.

Lead plaintiff has advised that it does not oppose this request.

Accordingly, we respectfully request that the Court consent to the modification of the page limit for the aforesaid defendants' opening brief in support of their motion to dismiss.

Thank you for your time and consideration.

Respectfully yours,



Alan S. Naar

ASN:cd

Enclosure

cc: All counsel of record (*via ecf*)